

## **Exhibit B**

**From:** Amazon Labor Union [info@amazonlaborunion.org](mailto:info@amazonlaborunion.org)  
**Subject:** ALU Mass Membership Meeting  
**Date:** Feb 16, 2024 at 9:41:41 PM  
**To:** michelle.valentin77@gmail.com

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Brothers & Sisters,

We are excited to announce there will be a mass membership meeting of Amazon Labor Union JFK8 workers.

Join us in discussing important information and updates regarding our **Contract Fight** with Amazon.

We want to hear from you! Your participation is important to the future of our union.

#### DAY & TIME

There will be two sessions:

Saturday, February 24, 2PM - 9PM

Sunday, February 25, 2PM - 8PM

#### LOCATION

The Hilton Hotel

1100 South Ave, Staten Island, NY 10314

In Solidarity,  
Amazon Labor Union

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[Become a Member of the ALU](#)

[Report a Workplace Incident](#)



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Sent via [ActionNetwork.org](#). To update your email address, change your name or address, or to stop receiving emails from Amazon Labor Union, please [click here](#).

# Exhibit C

**From:** Michelle Valentin [michelle.valentin77@gmail.com](mailto:michelle.valentin77@gmail.com)  
**Subject:** Fwd: ALU Meeting and Vote for Internal Elections  
**Date:** Feb 21, 2024 at 8:24:45 AM  
**To:** Evangeline Byars [evangelinebyars@gmail.com](mailto:evangelinebyars@gmail.com), Sean Patrick Riordan, Esq. Riordan [sean@licomplaw.com](mailto:sean@licomplaw.com)

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Sent from my iPhone

Begin forwarded message:

**From:** Amazon Labor Union <[info@amazonlaborunion.org](mailto:info@amazonlaborunion.org)>  
**Date:** February 21, 2024 at 6:53:45 AM EST  
**To:** [michelle.valentin77@gmail.com](mailto:michelle.valentin77@gmail.com)  
**Subject:** ALU Meeting and Vote for Internal Elections  
**Reply-To:** [info@amazonlaborunion.org](mailto:info@amazonlaborunion.org)



Brothers & Sisters,

This Saturday, February 24th and Sunday, February 25th, the Amazon Labor Union and the ALU Democratic Reform Caucus will be holding a mass membership meeting to discuss the upcoming internal union vote to determine whether there should be:

- Officer elections for the union's leadership (President, Vice President, Secretary-Treasurer, and Recording Secretary) to be conducted by May 30th, 2024.

**AND**

- Elections for an eleven person committee to review and update our union constitution to be conducted by May 30th, 2024.

The location of the mass membership meetings is the Hilton Garden Inn, 1100 South Ave, Staten Island, NY, 10314. All JFK8 blue badge workers are invited to join the meeting at any time, as there will be multiple sessions each day to make sure all shifts have a chance to attend and participate.

**Day 1 (Feb 24)**

Session 1: 2:00 PM - 5:00 PM

Session 2: 6:00 PM - 9:00 PM

**Day 2 (Feb 25)**

Session 1: 2:00 PM - 5:00 PM

Session 2: 6:00 PM - 8:00 PM

The internal union vote will be held next week, every day from Tuesday, February 27th to Saturday, March 2nd from 1:30 pm to 9:30 pm. The voting will either be by JFK8's main

entrance or the S40/S90 bus stop.

We highly encourage all of our coworkers to **VOTE** on both questions and let your voices be heard!

Our union is owned collectively by all JFK8 workers and must be run democratically. You have the right to participate in decisions which affect you! As the Amazon Labor Union, we are committed to representing and bringing voice to the concerns of all workers at JFK8. We must work together to bring Amazon to the bargaining table to negotiate a fair contract!

In solidarity and struggle,

Amazon Labor Union

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[Become a Member of the ALU](#)

[Report a Workplace Incident](#)



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Sent via [ActionNetwork.org](#). To update your email address, change your name or address, or to stop receiving emails from Amazon Labor Union, please [click here](#).

## Exhibit D



Evangeline Byars <evangelinebyars@gmail.com>

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**Fwd: Hello JFK8!**

1 message

**Michelle Valentin Nieves** < michelle.valentin77@gmail.com>  
To: Evangeline Byars <evangelinebyars@gmail.com>

Thu, Feb 22, 2024 at 3:43 PM

[Get Outlook for iOS](#)

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**From:** Michelle Valentin Nieves < michelle.valentin77@mail.mailchimpapp.com>  
**Sent:** Monday, February 19, 2024 8:47:42 PM  
**To:** michelle.valentin77@gmail.com < michelle.valentin77@gmail.com>  
**Subject:** Hello JFK8!

[View this email in your browser](#)



Don't go by discrediting important information and updates regarding our **Contract Fight** with Amazon.

We want to hear from you! Your participation is important to the future of our union.

**FALSE**

#### DAY & TIME

There will be two sessions:



Saturday, February 24, 2PM - 9PM

Sunday, February 25, 2PM - 8PM



#### LOCATION

The Hilton Hotel

1100 South Ave, Staten Island, NY 10314

(a) Nominations for all the elected offices of the Union shall be held at a general membership meeting during the month of April every three (3) years. Except that the first election will occur ninety (90) days after the JFK8 Collective Bargaining Agreement has been ratified by the membership.

(b) Not less than thirty (30) days prior to the membership meeting at which nominations will be made, notice thereof shall be posted in every work location, if applicable, and be communicated via normal digital channels. Such notice shall list the offices and positions to be filled and the time and place of such meeting. The notice may also contain the date, time and place at which elections will be held if there are any contests. The notice shall also state that, if there are no contests, a formal election will not be necessary, and announcements of the officers elected by acclamation will be posted on bulletin boards on the premises of employers where union members are employed as well as by normal

The Amazon Labor Union does not belong to a select few ! The Amazon Labor union is a worker lead union It belongs to the collective and we demand Transparency an injury to one is an injury to ALL !

Brothers and Sisters do not be mislead it is time we demand total



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You are receiving this email because you opted in via our website.

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Amazon Labor Union 546 Gulf Ave New York, NY 10314 USA

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Evangeline Byars &lt;evangelinebyars@gmail.com&gt;

## Protection of democratic processes in the ALU

1 message

Michelle Valentin &lt;michelle.valentin77@gmail.com&gt;

Wed, Feb 21, 2024 at 9:16 PM

To: sean@licomplaw.com, Griffin <griffinritze@gmail.com>, connor spence <connorspence14@gmail.com>, Terica <ladyvirgo1979@gmail.com>, tristian97alu@gmail.com, Chermo Toure <chermotoure@gmail.com>, Chris Smalls <Csmalls@amazonlaborunion.org>, Claudia Ashterman <claudia@amazonlaborunion.org>, Antoinette Maddocks <antoinettemaddocks@yahoo.com>, Evangeline Byars <evangelinebyars@gmail.com>, Jeanne Mirer <jmirer@workingpeopleslaw.com>, Julio Malerva <jr.malerva@gmail.com>, Kathleen Cole <Kathleencole1178@yahoo.com>, Maria Andujar <mandujar514@gmail.com>, Mark Fleischman <mark@actionnetwork.org>, Wilhelmenia Shuler <wilhelmenia@amazonlaborunion.org>, brima sylla <brimasylla@hotmail.com>, ronald boone <mrrboonejr@yahoo.com>, Arthur Schwartz <aschwartz@afjlaw.com>, Bill Dempsey <billdemp@gmail.com>, Lloyd Batson <lbapson@comcast.net>, "Nicole Druda (:ALU Former Board Member)" <druda@aol.com>

Amazon Labor Union,

Despite my position and responsibilities I have been systematically excluded from critical discussions and decisions this exclusion seems to be part of a much broader scheme to silence my dissent and manipulate the Unions governing processes thereby also disenfranchising our membership , I would like to highlight the misleading communications regarding the purpose of a mass membership meeting sent on February 16th 2024 the reason for this mass membership meeting was stated as discussions of the " contract fight " this misrepresentation was then corrected on February 21st 2024 only after I took steps to inform our members of the breach of our constitution and bylaws by Email on February 19th 2024 moreover the constitution and bylaws of the ALU explicitly states that the membership needs an advance notice of no less then 30 days so members can prepare you all have had Since January 5th 2024 to advise the membership of such special meetings and yet you failed to do so these recent actions of the ALU Officers and it's "Reform " Caucus are setting a dangerous precedent that, if unchecked, could severely compromise the integrity of our Unions democratic governance .

Kind Regards

Michelle Valentin Nieves

Vice President of The Amazon Labor Union

Sent from my iPhone

# Exhibit G

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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DR. BRIMA SYLLA, *et al.*,

Case No. 23-5261

Plaintiffs,

**CONSENT ORDER**

-against-

AMAZON LABOR UNION, and CHRIS SMALLS, as  
President of the Amazon Labor Union,

Defendants.

----- X

IT IS HEREBY STIPULATED AND AGREED this 5th day of January 2024 by and  
between Plaintiffs Brima Sylla et. al (collectively referred to as the Democratic Caucus of the  
Amazon Labor Union (hereafter the caucus) and the Amazon Labor Union and Christian Smalls,  
(hereafter ALU Defendants or ALU) through their counsel as follows:

1. The parties recognize that regardless of the legal merits or lack thereof in this  
litigation, continuing the litigation prevents all parties from uniting to work towards a good  
contract for the workers at Amazon's JFK 8 facility.
2. To this end the parties have committed to work together to achieve their common  
end of improving working conditions at Amazon by, *inter alia*, concluding a collective bargaining  
agreement at JFK8 and at the same time giving the members of the union a say in whether to hold  
various elections.
3. The parties have published a Unity Statement, emphasizing a desire to address  
winning the fight against Amazon's union busting activities and unfair disciplines against  
employees as well as their resistance to acknowledging the fair election victory by the ALU in  
April of 2022. The goal is to work together to achieve a collective bargaining agreement.

4. The parties agree to make no public statements either internally or externally critical of the other and to work together in the common interest of Amazon workers. This does not mean that parties must agree on issues, rather that disagreements be addressed on the merits and not as public personal attacks on various persons or union leaders.

5. Members the Caucus shall reintegrate with the union's representation mechanisms, so that the parties can both work to represent Amazon employees inside the warehouse and to jointly organize collective action.

6. On either Saturday February 24 or Sunday February 25, the union will hold a mass meeting of the members at a location as near to JFK 8 as possible.

7. The members will be advised of this meeting by all possible means to ensure wide participation. These means include sending emails, passing out and posting flyers, making phone calls and any other means to ensure that notice of the meeting and its purposes are given to all eligible Union members on all shifts and to those former employees who are eligible to vote.

8. The parties will seek assistance from the Court to access mailing and email lists of current JFK 8 workers or to use in advertising the mass meeting.

9. The purposes of this meeting will be for the Union's leadership to (1) update the members on ongoing activities of the union and progress toward bargaining a contract (2) to discuss whether to hold elections for new officers in the few months following the meeting, and (3) to discuss whether to elect a constitution committee to propose updating and amending the Union's constitution. The meeting will also be streamed or accessible on line if possible.

10. To accommodate as many shifts as possible, the meeting will be held at a venue large enough to accommodate members from each shift, and will be held at a time that the parties agree would allow the maximum participation of the members.

11. Voting on the propositions discussed at the mass membership meeting, including whether the officer elections or constitutional committee will take place on days following the mass meeting by secret ballot from Tuesday February 27 to Saturday March 2<sup>fto</sup> ensure that members from all shifts interested in having a say may have a time to vote.

12. The parties will work to develop a way for ballot boxes to be set up for voting in the JFK 8 breakrooms if possible or at any other place convenient to the workers.

13. Those no longer employed but still eligible to vote will be able to vote at the union offices, unless the convenient location is not under the control of Amazon

14. To vote on these propositions all currently employed non seasonal worker members must show ID and sign a union membership card.

15. The mass meeting and the voting will be overseen by the neutral monitor who will be selected by the parties, or Magistrate Merkl if there is no agreement among the parties. This selection should be made by January 16, 2024.

16. The parties will work to decide the logistical details for the meeting and the voting process on the two propositions. Any disagreements will be resolved by the neutral monitor.

17. Those eligible to vote will are those listed as eligible for membership in the November 2022 Constitution which states: Eligibility for membership in the Union shall be restricted to all workers in the ALU JFK 8 bargaining unit, including flex and part-time workers, employees on medical or workers compensation leave, those who are actively contesting their termination, or who are serving as officers or staff of ALU. Unusual circumstances of persons who previously worked for Amazon as non-seasonal workers can be addressed by the parties, and if they don't agree, by appeal to the neutral monitor.

18. The questions to be voted on after the mass meeting will be 1) whether the ALU should conduct an officer election, and/2) whether there should be an election of a constitution committee, no sooner than the end of May 2024 or no later than the end of July 2024.

19. If the members vote to have either or both elections, the decision about whether the election will occur in May or sometime later through the end of July will be determined by the neutral monitor and will depend on whether the monitor believes the election rules and/or election infrastructure are sufficiently developed by May 2024 to ensure a free and fair election at that time.

20. If the neutral monitor believes the infrastructure for an election needs further development the election can be scheduled no later than the end of July, 2024.

21. All parties shall work together as soon as possible to develop data bases for potential voters such that contact with each potential voter may be developed not only for an election but also for continued communication with the membership.

22. If the members agree to an election of officers, the parties shall work to develop nominating procedures and election rules for this election consistent with the current constitution and the LMRDA, and OLMS regulations. Any disputes between the parties regarding these rules will be resolved by the neutral monitor.

23. If the members agree to hold an election for officers, the election will be for President, Vice President, Recording Secretary, and Secretary Treasurer.

24. If the members agree to create an elected constitution committee, the election shall be for an eleven (11) member committee; the election will be conducted in conjunction with the officer election if the members vote for an officer election, but in any case would be at the times referred to in this agreement of either May or July. .

25. If at any time before the mass meeting or the election(s) if the members vote to have them, Amazon is ordered to bargain with the union, and active bargaining has commenced or

been scheduled to commence, the parties agree to pause this agreement so as to engage in bargaining, to the extent permissible by the Department of Labor under the LMRDA.

Dated: January 5, 2024

AMAZON LABOR UNION

By: Christian Smalls / w/ pm 15, 2024

Jeanne Mirer

Jeanne Mirer  
Counsel for Defendants

DEMOCRATIC CAUCUS OF THE  
AMAZON LABOR UNION

By: Arthur Z. Schwartz

Arthur Z. Schwartz

Arthur Z. Schwartz  
Counsel for Plaintiffs

SO ORDERED:

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United States Magistrate Judge